

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION**

ROSS MARTINIE EILER,
REV. BILL BREEDEN,

Plaintiffs,

v.

COMPLEX WARDEN, FEDERAL
CORRECTIONAL COMPLEX, TERRE
HAUTE, in his official capacity,

Defendant.

Civil Action No. 2:23-cv-205-MPB-MKK

JOINT MOTION TO STAY CASE DEADLINES

The Parties jointly respectfully request a stay of all deadlines in the above-captioned litigation—(1) Defendant’s deadline to answer or otherwise respond to the Complaint, currently set for June 26, 2023; (2) the Parties’ deadline to file a proposed case management plan, currently set for June 30, 2023, *see* Order, ECF No. 16; and (3) the initial pretrial conference, currently set for July 6, 2023, *see id.*—so that the Parties may proceed with initial discussions aimed toward settlement in an amicable manner between parties. *See* Fed. R. Civ. P. 6(b)(1)(A).

On August 21, 2023 (in sixty days), if this matter has not already been dismissed by stipulation of the Parties, the Parties propose to file a joint status report with the Court that updates the Court on the status of settlement discussions and proposes a plan for how to proceed. The Parties seek this stay for good cause, as they believe that this matter may be resolved without the need for further litigation. Aside from the aforementioned deadlines, no other existing deadlines will be affected by the proposed extension, and no party will suffer prejudice, as discovery has not begun. A proposed order is attached.

DATED: June 23, 2023

Respectfully submitted,

/s/ Kenneth J. Falk

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